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Attorneys for Defendant and Counterclaim
Plaintiff SOPHOS INC. and Counterclaim
Plaintiff SOPHOS LTD.

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

17 FORTINET, INC., a corporation

18 Plaintiff,

19 vs.

20 SOPHOS, INC., a corporation, MICHAEL
VALENTINE, an individual, and JASON
CLARK, an individual.

21 Defendants.
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23 SOPHOS INC. and SOPHOS LTD.,
corporations,

24 Counterclaim Plaintiffs,

25 vs.

26 FORTINET, INC., a corporation,

27 Counterclaim Defendant.
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Case No. 3:13-cv-05831-EMC

**STIPULATION AND PROPOSED
ORDER TO STAY CASE SCHEDULE
FOR TWENTY (20) DAYS**

1 WHEREAS Plaintiff and Counterclaim-Defendant Fortinet, Inc. ("Fortinet") and Defendants
2 and Counterclaim-Plaintiffs Sophos Inc. and Sophos Ltd. (collectively, "Sophos") have disputed
3 Sophos' responses to certain requests for inspection propounded by Fortinet related to former Fortinet
4 employees, who are currently Sophos employees;

5 WHEREAS, on June 25, 2015, prior to a discovery hearing on two joint discovery letters,
6 Sophos agreed to allow Fortinet access to devices and images of the former Fortinet employees'
7 devices pursuant to the terms of Stipulation and Order being filed with Magistrate Judge Ryu;

8 WHEREAS, Fortinet needs time to inspect, investigate, and analyze the data from these
9 forensic images for evidence related to its claims;

10 WHEREAS, given the foregoing, the parties agreed to a stay of the case schedule for twenty
11 (20) days;

12 WHEREAS, Magistrate Judge Ryu directed the parties to file a joint status report to update the
13 Court on these inspections by July 16, 2015. *See* Docket No. 161.

14 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties that:

15 The parties respectfully request the case schedule be stayed for twenty (20) days, until July 16,
16 2015.

1 DATED: June 26, 2015

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

3 By /s/ John M. Neukom

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Attorneys for Plaintiff FORTINET, INC.

9 DATED: June 26, 2015

DLA PIPER LLP (US)

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Attorneys for Defendant and Counterclaim
Plaintiff SOPHOS INC. and Counterclaim
Plaintiff SOPHOS LTD.

19 **SIGNATURE ATTESTATION**

20 Pursuant to Local Rule 5.1(i)(3), I attest under penalty of perjury that concurrence in the filing
21 of this document has been obtained from David Knudson.

23 /s/ Grant N. Margeson

24 Grant N. Margeson

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FORTINET, INC., a corporation

Plaintiff,

vs.

SOPHOS, INC., a corporation, MICHAEL
VALENTINE, an individual, and JASON
CLARK, an individual.

Defendants.

Case No. 3:13-cv-05831-EMC

**[PROPOSED] ORDER STAYING
CASE SCHEDULE FOR TWENTY (20)
DAYS**

SOPHOS INC. and SOPHOS LTD.,
corporations,

Counterclaim Plaintiffs,

vs.

FORTINET, INC., a corporation,

Counterclaim Defendant.

PURSUANT TO STIPULATION, IT IS SO ORDERED. The case is stayed for twenty
(20) days until July 16, 2015.

Dated: _____, 2015 By: _____

HONORABLE EDWARD M. CHEN